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April 8, 2025

## Via ECF

Judge Jesse M. Furman **United States District Court** Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

> Re: Joshua Pickar v. Indiana Federal Community Defenders, Inc. et al.

Our Client: Indiana Federal Community Defenders, Inc., Monica Foster,

Angela Elleman, Sara Varner, and Jean Giles

1:25-cy-01353-JMF Case No.:

## Dear Judge Furman:

This Firm represents the Defendants, Indiana Federal Community Defenders, Inc. ("IFCD"), Monica Foster, Angela Elleman, Sara Varner, and Jean Giles in the above-referenced matter (collectively "Defendants"). Pursuant to Judge Furman's Order dated April 4, 2025, Defendants were instructed to file a redacted version of their opposition (ECF No. 19) to Plaintiff's Letter Motion to Limit Redactions Under Seal (ECF No. 15), along with a letter motion seeking leave to file their opposition under seal. In accordance with same, we are respectfully submitting this letter motion to request that the Court allow Defendants to file our Letter Motion in Opposition to Plaintiff's Letter Motion to Limit Redactions Under Seal.

Thank you for your time and consideration.

Respectfully Submitted,

WOOD, SMITH, HENNING & BERMAN LLP

Paul Lieberman, Esq. (via ECF) cc: Marshall B. Bellovin, Esq. (via ECF)

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Application GRANTED. The Court finds the redactions are narrowly tailored to reasons that justify overcoming the presumption in favor of public access to judicial documents. The Clerk of Court is directed to file and maintain ECF No. 19 under seal and to terminate ECF No. 21.

SO ORDERED.

April 8, 2025